

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

*Plaintiff,*

v.

GOOGLE LLC,

*Defendant.*

No: 1:23-cv-00108-LMB-JFA

**[PROPOSED ORDER] GRANTING DEFENDANT GOOGLE'S AND PLAINTIFFS'  
MOTIONS TO SEAL**

Pursuant to Local Civil Rule 5(C), this matter is before the Court on Motions to Seal Exhibits for Briefing on Summary Judgment and Motions to Exclude Expert Testimony under seal.

Google LLC and Plaintiffs each filed public notice of its request to seal. This Court extended the deadline for responses to both Defendant's and Plaintiffs' motions to seal to June 14, 2024, to allow interested parties a reasonable opportunity to object.

Upon consideration of Google's and Plaintiffs' Motions and supporting papers, including IPG's response and supporting declaration, the Court finds that (i) sufficient notice has been given; (ii) the redacted text of the exhibits contain IPG's competitively sensitive financial terms of IPG's client contracts, other non-public and sensitive contractual or commercial terms, performance metrics and key-performance indicators, commercially sensitive strategies of IPG or which IPG has designed for its clients, and contact information for IPG employees, which is information that is not normally available to the public and has no bearing on the merits of the case; (iii) only sealing will sufficiently protect IPG from irreparable competitive harm; (iv) the

limited sealing and redactions properly balance IPG's interests as against the public's interest; and (v) the public's right of access has been overcome; and it is hereby **ORDERED** that the Motions to Seal are **GRANTED** in part and the exhibit redactions highlighted in blue and brown in IPG's Attachments A-J of the Declaration shall remain permanently sealed.

IT IS SO ORDERED.

ENTERED this \_\_\_\_ day of \_\_\_\_\_ 2024.

---

Honorable Leonie M. Brinkema  
United States District Judge